

IN RE:

CHAPTER: 13
CASE NO.: 15-02878
JUDGE: HARRISON

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

LATRAE DARNELL HAMPTON
MIATTA KEBEE HAMPTON
1501 WOODLAND POINTE DR., APT 304
NASHVILLE, TN 37214
SSN: XXX-XX-6464/3267
Debtor

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CHAPTER: 13
CASE NO.: 15-02878
JUDGE: HARRISON

**MOTION TO UTILIZE INSURANCE PROCEEDS AND TO REQUIRE CREDITOR TO RELEASE
TITLE OF DESTROYED VEHICLE TO ALLOW DISPOSITION OF SALVAGE**

COMES THE DEBTOR, through counsel, Rothschild and Ausbrooks, PLLC, and would move to utilize insurance proceeds and require Creditor to release title of destroyed vehicle to allow disposition of salvage and in support of this motion would state as follows:

1) Debtor moves the Court for an order authorizing them to use insurance proceeds issued as a result of a total loss accident by Progressive Group of Insurance Companies in the amount of \$4,716.00.

2) Debtor further moves the Court to require the line-holder on the totaled 2013 Chrysler 200, Insolve Auto Funding, LLC, to release its lien on the title and to remit same to Progressive Group of Insurance Companies to allow disposition of salvage.

3) Progressive Group of Insurance Companies shall remit \$3,894.66 to the Chapter 13 Trustee to be earmarked for the claim of Insolve Auto Funding, LLC (ECF Claim #20). Progressive Group of Insurance Companies shall remit the remaining \$821.34, exempt under T.C.A. §26-2-103, to the Debtors to be utilized in purchasing a replacement vehicle free and clear of liens.

Respectfully submitted,

/s/ Jodie Thresher

Jodie Thresher

ROTHSCHILD & AUSBROOKS, PLLC

Attorney for Debtor(s)

1222 16th Avenue South, Suite 12

Nashville, TN 37212

(615) 242-3996 (telephone)

(615) 242-2003 (facsimile)

notice@rothschildbklaw.com

CERTIFICATE OF SERVICE

I certify that on this 15th day of April, 2019, I served a copy of the foregoing in the following manner:

Email by Electronic Case Noticing to:

Asst. U.S. Trustee

Henry E. Hildebrand, III, Chapter 13 Trustee

By U.S. Postal Service, postage prepaid to:

To the Debtor and affected parties per the attached mailing matrix below.

By U.S. Postal Service, Certified Mail to:

By email to:

Progressive Group of Insurance Companies via email to Caroline_Herd@progressive.com

/s/ Jodie Thresher

Jodie Thresher

63 TOTAL USPS MAILINGS: \$63.00

Action Collection Agency

Attn: Officer Manager or Agent

PO Box 210166

Nashville TN 37221

Advance Financial

Attn Officer Manager or Agent

1901 Church St

Nashville TN 37203

American Car Center

Attn: Officer Manager or Agent

1635 Bell Road

Nashville TN 37211

American Financial

6400 Winchester Road

Memphis, TN 38115

American InfoSource LP as agent for

Midland Funding LLC

PO Box 268941

Oklahoma City, OK 73126-8941

Belmont University

Attn: Officer Manager or Agent

181 Montour Run Road

Coraopolis PA 15108

Capital One

Attn: Officer
PO Box 30285
Salt Lake City UT 84130-0285

Cavalry SPV I, LLC

500 Summit Lake Drive, Ste 400
Valhalla, NY 10595

Credit One Bank

Attn: Officer
PO Box 98872
Las Vegas NV 89193

Credit Vision Inc

Attn: Officer Manager or Agent
2211 E Continental Blvd #170
Southlake TX 76092

DIAGNOSTIC IMAGING, INC
C/O FOX COLLECTION CENTER
PO BOX 528
GOODLETTSVILLE, TN 37070

Discover Financial Services LLC

Attn: Officer
PO Box 15316
Wilmington DE 19850

Eagle Accounts Group Inc

Attn: Officer Manager or Agent
PO Box 17400
Indianapolis IN 46217-0400

FedLoan Servicing Credit

Attn: Officer Manager or Agent
PO Box 60610
Harrisburg PA 17106-0610

First Premier Bank

Attn: Officer
3820 N Louise Ave
Sioux Falls SD 57107-0145

Harpeth Financial Services, LLC

c/o Glen Watson, Attorney
P.O. Box 121950
Nashville, TN 37212

Internal Revenue Service

Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA. 19101-7346

Cash 1

Attn: Officer Manager or Agent
PO Box 110787
Nashville TN 37222-0787

Credit Acceptance Corp

Attn: Officer Manager or Agent
25505 W 12 Mile Rd #3000
Southfield MI 48034-8339

Credit Solutions LLC

Attn: Officer Manager or Agent
2277 Thunderstick Dr #400
Lexington KY 40505-9002

DAVIDSON COUNTY CRIMINAL COURT

C/O ROBINSON REAGAN & YOUNG
446 JAMES ROBERTSON PKWT
SUITE 200
NASHVILLE, TN 37219

Discover Bank

Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Drive Time

Attn: Officer Manager or Agent
PO Box 29018
Phoenix AZ 85038

Equiant Financial Svcs

Attn: Officer Manager or Agent
5401 N Pima Rd #150
Scottsdale AZ 85250

First National Credit Card

Attn: Officer
500 E 60th St N
Sioux Falls SD 57104-0478

Fox Collection Center

Attn: Officer Manager or Agent
PO Box 528
Goodlettsville TN 37070-0528

InSolve Auto Funding, LLC, c/o Capital Recovery Gr

Dept 3403
PO Box 123403
Dallas, TX 75312-3403

Jerry E Martin Esq/US Attorney

Middle District of TN
801 Broadway #400
Nashville TN 37203

LEGACY VISA

C/O MILLENNIUM FINANCIAL GROUP
LLC
3000 UNITED FOUNDERS BLVD SUITE
219
OKLAHOMA CITY OK 73112

MAPFRE Insurance

Attn: Officer Manager or Agent
11 Gore Road
Webster MA 01570

Merrick Bank

Attn: Officer
PO Box 1500
Draper UT 84020

Midland Credit Management, Inc.

as agent for MIDLAND FUNDING LLC
PO Box 2011
Warren, MI 48090

Navient Solutions Inc.

220 Lasley Ave
Wilkes-Barre, PA 18706

Pinnacle Credit Svcs

Attn: Officer Manager or Agent
PO Box 640
Hopkins MN 55343-0640

PREMIER ORTHO-DR J WIECK

C/O FOX COLLECTION CENTER
PO BOX 528
GOODLETSVILLE, TN 37070

Purchasing Power

Attn: Officer Manager or Agent
1349 W Peachtree St NW #1100
Atlanta GA 30309

Revenue Recovery Corp

Attn: Officer Manager or Agent
PO Box 50250
Knoxville TN 37950-0250

Sallie Mae/Navient/Bankruptcy Dept

Attn: Officer Manager or Agent
PO Box 9430
Wilkes Barre PA 18773-9735

Sprint Corp Bankruptcy Dept

Attn: Officer Manager or Agent
PO Box 7949
Overland Park KS 66207-0949

Stellar Recovery Inc**LHR Inc**

Attn: Officer Manager or Agent
56 Main Street
Hamburg NY 14075-4905

MARS Inc

Attn: Officer Manager or Agent
5810 E Skelly Drive #200
Tulsa OK 74135

MERRICK BANK

Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Midland Funding LLC

Attn: Officer Manager or Agent
8875 Aero Drive #200
San Diego CA 92123

Navient Solutions, Inc.

220 Lasley Ave
Wilkes-Barre, PA 18706

Premier Bank, LLC

c o Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-9617

PREMIER ORTHO-HARDING PT

C/O FOX COLLECTION CENTER
PO BOX 528
GOODLETSVILLE, TN 37070

RADIOLOGY ALLIANCE

C/O FOX COLLECTION CENTER
PO BOX 528
GOODLETSVILLE, TN 37070

Robinson Reagan & Young PLLC

Attn: Officer Manager or Agent
105 Broadway #300
Nashville TN 37201

Santander Consumer Bankruptcy Dept

Attn: Officer Manager or Agent
PO Box 560284
Dallas TX 75356-0284

Sprint Corp.

Attn Bankruptcy Dept
PO Box 7949
Overland Park KS 66207-0949

TD BANK USA, N.A.

Attn: Officer Manager or Agent
1327 Hwy 2 W #100
Kalispell MT 59901

C O WEINSTEIN & RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121

TD Bank USA/Target Credit

Attn: Officer
PO Box 673
Minneapolis MN 55440

Telerhythmics LLC

Attn: Officer Manager or Agent
60 Market Center Dr
Collierville TN 38017

TN Student Assistance Corp

Attn: Officer Manager or Agent
PO Box 173695
Denver CO 80217-3695

United States Attorney General

Department of Justice
950 Pennsylvania Ave NW
Washington DC 20530-0001

US Dept of Education/Nelnet

Attn: Officer Manager or Agent
3015 Parker Road #400
Aurora CO 80014

Tek Collect

Attn: Officer Manager or Agent
PO Box 1269
Columbus OH 43216

TN Atty Generals Office BK Unit

RE: TN Student Assistance Corp
PO Box 20207
Nashville TN 37202

U.S. Department of Education

C/O Nelnet
3015 South Parker Road, Suite 400
Aurora, CO 80014

Universal Charge Account

Attn: Officer Manager or Agent
665 Rodi Rd #300
Pittsburgh PA 15235

Western Kentucky Univ/Perkins Loan Ofc

Attn: Officer Manager or Agent
1906 College Hgts #11023
Bowling Green KY 42101